

# **Exhibit A**



**Service of Process  
Transmittal**

06/03/2019

CT Log Number 535603467

**TO:** Ken Murata  
Samsung Electronics America, Inc.  
85 Challenger Rd Fl 7  
Ridgefield Park, NJ 07660-2118

**RE: Process Served in Illinois**

**FOR:** Samsung Electronics America, Inc. (Domestic State: NY)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Lashoyna Taylor, Pltff. vs. Samsung Electronics America, Inc., etc., et al., Dfts.  
**DOCUMENT(S) SERVED:** Summonses, Complaint, Jury Demand, Affidavit  
**COURT/AGENCY:** Cook County Circuit Court - County Department - Law Division, IL  
Case # 2019L005640  
**NATURE OF ACTION:** Product Liability Litigation - Manufacturing Defect - Galaxy S7 Edge  
**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Chicago, IL  
**DATE AND HOUR OF SERVICE:** By Process Server on 06/03/2019 at 15:18  
**JURISDICTION SERVED :** Illinois  
**APPEARANCE OR ANSWER DUE:** Within 30 days after service, not counting the day of service  
**ATTORNEY(S) / SENDER(S):** Jeffrey C. Schwartz  
Kralovec, Jambois & Schwartz  
60 W. Randolph St., 4th Floor  
Chicago, IL 60601  
312-782-2525  
**ACTION ITEMS:** SOP Papers with Transmittal, via UPS Next Day Air , 1ZX212780114194072  
Image SOP  
Email Notification, Ken Murata ken.murata@sea.samsung.com  
Email Notification, Christopher Low clow@sea.samsung.com  
Email Notification, Gabriel Ramos g.ramos@partner.sea.samsung.com  
Email Notification, Alessandra Schneider alessandra.s@sea.samsung.com  
Email Notification, Richard Rosalez r.rosalez@SEA.samsung.com  
Email Notification, Michael Sharples m.sharples@sea.samsung.com  
Email Notification, Jordan Flournoy j.flournoy@sea.samsung.com  
Email Notification, Chris Park jinho01.park@sea.samsung.com



**Service of Process  
Transmittal**

06/03/2019

CT Log Number 535603467

**TO:** Ken Murata  
Samsung Electronics America, Inc.  
85 Challenger Rd Fl 7  
Ridgefield Park, NJ 07660-2118

**RE: Process Served in Illinois**

**FOR:** Samsung Electronics America, Inc. (Domestic State: NY)

Email Notification, Gary Tulp gary.tulp@sea.samsung.com

Email Notification, Rachel S Harris r.harris@sea.samsung.com

**SIGNED:** C T Corporation System  
**ADDRESS:** 208 South LaSalle Street  
Suite 814  
Chicago, IL 60604  
**TELEPHONE:** 312-345-4336

2120 - Served                      2121 - Served  
 2220 - Not Served                2221 - Not Served  
 2320 - Served By Mail           2321 - Served By Mail  
 2420 - Served By Publication   2421 - Served By Publication  
 Summons - Alias Summons

(06/28/18) CCG 0001

FILED  
 5/23/2019 3:14 PM  
 DOROTHY BROWN  
 CIRCUIT CLERK  
 COOK COUNTY, IL  
 2019L005640

5171557

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

LASHOYNA TAYLOR

(Name all parties)

v.

SAMSUNG ELECTRONICS AMERICA, INC, et al.

Case No. &lt;CaseNumber&gt;

☒ SUMMONS    ☐ ALIAS SUMMONS

SAMSUNG ELECTRONICS  
 AMERICA, INC  
 R/A: CT Corp. Systems 208 So.  
 LaSalle St., Suite 814 Chicago, IL  
 60604

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee **within thirty (30) days after service of this Summons**, not counting the day of service. To file your answer or appearance you need access to the internet. Please visit [www.cookcountyclerkofcourt.org](http://www.cookcountyclerkofcourt.org) to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

If you fail to do so, a judgment by default may be entered against you for the relief requested in the complaint.

To the Officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <https://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>.

Witness: 5/23/2019 3:14 PM DOROTHY BROWN

Atty. No.: 24797

Atty Name: Kralovec, Jambois &amp; Schwartz

Atty. for: Plaintiff

Address: 60 W. Randolph St., 4th Floor

City: Chicago State: IL

Zip: 60601

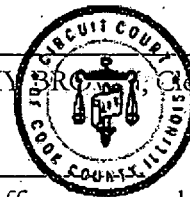
Telephone: 312-782-2525

Primary Email: jschwartz@kjs-law.com

Secondary Email: chenry@kjs-law.com

Tertiary Email: kbarrette@kjs-law.com

DOROTHY BROWN, Clerk of Court



Date of Service: \_\_\_\_\_  
 (To be inserted by officer on copy left with Defendant or other person):

Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois    [cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)

**CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS**

FILED DATE: 5/23/2019 3:14 PM 2019L005640

- Richard J Daley Center  
50 W Washington  
Chicago, IL 60602
  - District 2 - Skokie  
5600 Old Orchard Rd  
Skokie, IL 60077
  - District 3 - Rolling Meadows  
2121 Euclid  
Rolling Meadows, IL 60008
  - District 4 - Maywood  
1500 Maybrook Ave  
Maywood, IL 60153
  - District 5 - Bridgeview  
10220 S 76th Ave  
Bridgeview, IL 60455
  - District 6 - Markham  
16501 S Kedzie Pkwy  
Markham, IL 60428
  - Domestic Violence Court  
555 W Harrison  
Chicago, IL 60607
  - Juvenile Center Building  
2245 W Ogden Ave, Rm 13  
Chicago, IL 60602
  - Criminal Court Building  
2650 S California Ave, Rm 526  
Chicago, IL 60608
  - Domestic Relations Division  
Richard J Daley Center  
50 W Washington, Rm 802  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Civil Appeals  
Richard J Daley Center  
50 W Washington, Rm 801  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Criminal Department  
Richard J Daley Center  
50 W Washington, Rm 1006  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - County Division  
Richard J Daley Center  
50 W Washington, Rm 1202  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Probate Division  
Richard J Daley Center  
50 W Washington, Rm 1202  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Law Division  
Richard J Daley Center  
50 W Washington, Rm 801  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Traffic Division  
Richard J Daley Center  
50 W Washington, Lower Level  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
- Daley Center Divisions/Departments**
- Civil Division  
Richard J Daley Center  
50 W Washington, Rm 601  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Chancery Division  
Richard J Daley Center  
50 W Washington, Rm 802  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm

2120 - Served                      2121 - Served  
 2220 - Not Served                2221 - Not Served  
 2320 - Served By Mail            2321 - Served By Mail  
 2420 - Served By Publication    2421 - Served By Publication  
 Summons - Alias Summons

(06/28/18) CCG 0001

FILED  
 5/23/2019 3:14 PM  
 DOROTHY BROWN  
 CIRCUIT CLERK  
 COOK COUNTY, IL  
 2019L005640

5171557

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

LASHOYNA TAYLOR

(Name all parties)

v.

SAMSUNG ELECTRONICS AMERICA, INC, et al.

Case No. &lt;CaseNumber&gt;

☒ SUMMONS    ☐ ALIAS SUMMONS

SAMSUNG ELECTRONICS  
 AMERICA, INC  
 R/A: CT Corp. Systems 208 So.  
 LaSalle St., Suite 814 Chicago, IL  
 60604

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee **within thirty (30) days after service of this Summons**, not counting the day of service. To file your answer or appearance you need access to the internet. Please visit [www.cookcountyclerkofcourt.org](http://www.cookcountyclerkofcourt.org) to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

If you fail to do so, a judgment by default may be entered against you for the relief requested in the complaint.

To the Officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <https://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>.

Witness: 5/23/2019 3:14 PM DOROTHY BROWN

Atty. No.: 24797

Atty Name: Kralovec, Jambois &amp; Schwartz

Atty. for: Plaintiff

Address: 60 W. Randolph St., 4th Floor

City: Chicago State: IL

Zip: 60601

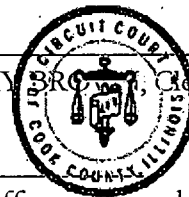
Telephone: 312-782-2525

Primary Email: jschwartz@kjs-law.com

Secondary Email: chenry@kjs-law.com

Tertiary Email: kbarrette@kjs-law.com

DOROTHY BROWN, Clerk of Court




Date of Service: \_\_\_\_\_  
 (To be inserted by officer on copy left with Defendant or other person):

Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois    [cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)

**CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS**

FILED DATE: 5/23/2019 3:14 PM 2019L005640

- Richard J Daley Center  
50 W Washington  
Chicago, IL 60602
  - District 2 - Skokie  
5600 Old Orchard Rd  
Skokie, IL 60077
  - District 3 - Rolling Meadows  
2121 Euclid  
Rolling Meadows, IL 60008
  - District 4 - Maywood  
1500 Maybrook Ave  
Maywood, IL 60153
  - District 5 - Bridgeview  
10220 S 76th Ave  
Bridgeview, IL 60455
  - District 6 - Markham  
16501 S Kedzie Pkwy  
Markham, IL 60428
  - Domestic Violence Court  
555 W Harrison  
Chicago, IL 60607
  - Juvenile Center Building  
2245 W Ogden Ave, Rm 13  
Chicago, IL 60602
  - Criminal Court Building  
2650 S California Ave, Rm 526  
Chicago, IL 60608
  - Domestic Relations Division  
Richard J Daley Center  
50 W Washington, Rm 802  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Civil Appeals  
Richard J Daley Center  
50 W Washington, Rm 801  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Criminal Department  
Richard J Daley Center  
50 W Washington, Rm 1006  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - County Division  
Richard J Daley Center  
50 W Washington, Rm 1202  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Probate Division  
Richard J Daley Center  
50 W Washington, Rm 1202  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Law Division  
Richard J Daley Center  
50 W Washington, Rm 801  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Traffic Division  
Richard J Daley Center  
50 W Washington, Lower Level  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
- Daley Center Divisions/Departments**
- Civil Division  
Richard J Daley Center  
50 W Washington, Rm 601  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Chancery Division  
Richard J Daley Center  
50 W Washington, Rm 802  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm

|   |  |                                    |
|---|--|------------------------------------|
| <br>* 0 3 1 1 1 5 1 7 *  |  | <b>DIE DATE</b><br>06/16/2019      |
| <b>DOC. TYPE:</b> LAW<br><b>CASE NUMBER:</b> 2019L005640<br><b>DEFENDANT</b><br>SANSUNG ELECTRONICS AMERICA INC<br>208 S LASALLE ST<br>CHICAGO, IL 60604<br>STE 814 |  | <b>SERVICE INF</b><br>RM 801 R A C |
| <b>ATTACHED</b>   |  |                                    |



2120 - Served                      2121 - Served  
 2220 - Not Served                2221 - Not Served  
 2320 - Served By Mail            2321 - Served By Mail  
 2420 - Served By Publication    2421 - Served By Publication  
 Summons - Alias Summons

(06/28/18) CCG 0001

FILED  
 5/23/2019 3:14 PM  
 DOROTHY BROWN  
 CIRCUIT CLERK  
 COOK COUNTY, IL  
 2019L005640

5171557

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

LASHOYNA TAYLOR

(Name all parties)

v.

SAMSUNG ELECTRONICS AMERICA, INC, et al.

Case No. &lt;CaseNumber&gt;

☒ SUMMONS    ☐ ALIAS SUMMONS

SAMSUNG ELECTRONICS  
 AMERICA, INC  
 R/A: CT Corp. Systems 208 So.  
 LaSalle St., Suite 814 Chicago, IL  
 60604

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee **within thirty (30) days after service of this Summons**, not counting the day of service. To file your answer or appearance you need access to the internet. Please visit [www.cookcountyclerkofcourt.org](http://www.cookcountyclerkofcourt.org) to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

If you fail to do so, a judgment by default may be entered against you for the relief requested in the complaint.

To the Officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <https://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>.

Witness: 5/23/2019 3:14 PM DOROTHY BROWN

Atty. No.: 24797

Atty Name: Kralovec, Jambois &amp; Schwartz

Atty. for: Plaintiff

Address: 60 W. Randolph St., 4th Floor

City: Chicago State: IL

Zip: 60601

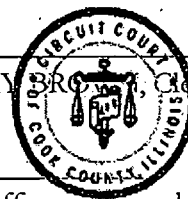
Telephone: 312-782-2525

Primary Email: jschwartz@kjs-law.com

Secondary Email: chenry@kjs-law.com

Tertiary Email: kbarrette@kjs-law.com

DOROTHY BROWN, Clerk of Court



Date of Service: \_\_\_\_\_  
 (To be inserted by officer on copy left with Defendant or other person):

Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois    [cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)

**CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS**

FILED DATE: 5/23/2019 3:14 PM 2019L005640

- Richard J Daley Center  
50 W Washington  
Chicago, IL 60602
  - District 2 - Skokie  
5600 Old Orchard Rd  
Skokie, IL 60077
  - District 3 - Rolling Meadows  
2121 Euclid  
Rolling Meadows, IL 60008
  - District 4 - Maywood  
1500 Maybrook Ave  
Maywood, IL 60153
  - District 5 - Bridgeview  
10220 S 76th Ave  
Bridgeview, IL 60455
  - District 6 - Markham  
16501 S Kedzie Pkwy  
Markham, IL 60428
  - Domestic Violence Court  
555 W Harrison  
Chicago, IL 60607
  - Juvenile Center Building  
2245 W Ogden Ave, Rm 13  
Chicago, IL 60602
  - Criminal Court Building  
2650 S California Ave, Rm 526  
Chicago, IL 60608
  - Domestic Relations Division  
Richard J Daley Center  
50 W Washington, Rm 802  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Civil Appeals  
Richard J Daley Center  
50 W Washington, Rm 801  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Criminal Department  
Richard J Daley Center  
50 W Washington, Rm 1006  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - County Division  
Richard J Daley Center  
50 W Washington, Rm 1202  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Probate Division  
Richard J Daley Center  
50 W Washington, Rm 1202  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Law Division  
Richard J Daley Center  
50 W Washington, Rm 801  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Traffic Division  
Richard J Daley Center  
50 W Washington, Lower Level  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
- Daley Center Divisions/Departments**
- Civil Division  
Richard J Daley Center  
50 W Washington, Rm 601  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Chancery Division  
Richard J Daley Center  
50 W Washington, Rm 802  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm



DIE DATE  
06/16/2019

DOC.TYPE: LAW  
CASE NUMBER: 2019L005640

**DEFENDANT**  
SANSUNG ELECTRONICS AMERICA INC  
208 S LASALLE ST  
CHICAGO, IL 60604  
STE 814

**SERVICE INF**  
RM 801 R A C

ATTACHED

**12-Person Jury****IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**FILED  
5/23/2019 3:14 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL  
2019L005640**LASHOYNA TAYLOR,**

Plaintiff,

v.

No. 2019L005640

**SAMSUNG ELECTRONICS AMERICA, INC., a**  
New York corporation, **SAMSUNG SDI CO., LTD.,**  
a Foreign corporation, **SAMSUNG SDI AMERICA,**  
**INC.,** a California corporation, and **T-MOBILE**  
**USA, INC.,** a Delaware corporation.

Defendants.

**COMPLAINT AT LAW**

NOW COMES, the Plaintiff, **LASHOYNA TAYLOR**, by and through his attorneys, **KRALOVEC, JAMBOIS & SCHWARTZ**, and complaining of the Defendant, **SAMSUNG ELECTRONICS AMERICA, INC.**, states as follows:

**COUNT I – SAMSUNG ELECTRONICS AMERICA, INC**  
**(Negligence)**

1. At all times relevant hereto, Plaintiff, **LASHOYNA TAYLOR**, was and is a citizen and resident of Palos Hills, County of Cook, in the State of Illinois.

2. At all times relevant hereto, a substantial part of the counts giving rise to Plaintiff's complaint occurred in Cook County, State of Illinois.

3. Defendant, **SAMSUNG ELECTRONICS AMERICA, INC.** ("Samsung America"), is, and at all relevant times was, a New York corporation and a subsidiary of Samsung Electronics Co. LTD. Samsung Electronics is a consumer and industrial electronic manufacturer. It researches, develops, tests, produces, markets, promotes, and sells electronic products including the Samsung Galaxy S7 Edge used by Plaintiff.

5. Defendant, **SAMSUNG SDI CO., LTD.**, (“Samsung SDI”), is, and at all times relevant to this action was, a foreign corporation incorporated in South Korea. Samsung SDI is an electronics components manufacturer which specializes in lithium-ion batteries. It researches, develops, tests, markets, promotes, and sells batteries used in electronics such as Galaxy S7 Edge phones.

6. Defendant, **SAMSUNG SDI AMERICA, INC.** (“Samsung SDI America”), is, and at all relevant times was, a California corporation. It is a subsidiary of Samsung SDI. It also researches, develops, tests, markets, promotes, distributes, provides support services, and sells electronic components such as the batteries used in Galaxy S7 Edge phones.

7. Defendant, **T-MOBILE USA, INC.** (“T-Mobile”), is, and at all relevant times was, a Delaware corporation. It is a telecommunications company and, along with selling other telecommunication services, it sells and advertises phones, including the Galaxy S7 Edge used by Plaintiff. It sells its phones through its website and brick and motor stores nationwide.

8. Defendants are individually, jointly, and severally liable to Plaintiff for damages she suffered which arose from Defendants’ design, manufacture, marketing, labeling, distribution, and sale of the defective Samsung Galaxy S7 Edge at issue in this action, effectuated directly and indirectly through their respective agents, servants, employees, and/or owners, all acting within the course and scope of their representative agencies, services, employments and/or ownerships.

9. That prior to February 19, 2018, all Defendants conducted business and derived substantial revenue from Illinois and Cook County, Illinois. Defendants have sufficient minimum contacts with, and have purposefully availed themselves to, Illinois in ways that justifies Illinois exercising jurisdiction.

10. That on February 19, 2018, the Galaxy S7 Edge phone giving rise to this suit exploded while Plaintiff was at work located at 909 W. Euclid Avenue, Arlington Heights, Cook County, Illinois.

11. This Court may exercise jurisdiction over Defendants under the laws of Illinois, the Illinois Constitution, and the Constitution of the United States.

12. Venue is proper in this Court as a substantial part of the counts giving rise to this complaint occurred in Cook County, Illinois and Plaintiff is also a Cook County resident.

13. On June 6, 2016, Plaintiff, **LASHOYNA TAYLOR**, purchased the Galaxy S7 Edge phone at issue from a T-Mobile Store located at 7600 W. 95<sup>th</sup> Street, Suite 3, Hickory Hills, Illinois 60457.

14. On and prior to February 19, 2018, Plaintiff operated the Galaxy S7 Edge in a manner for which it is reasonably intended or in a reasonably foreseeable manner.

15. At all relevant times, Defendant, **SAMSUNG ELECTRONICS AMERICA, INC**, had a duty to use ordinary care in its design, preparation, manufacture, advertisement, distribution, supply, and sale of their Galaxy S7 Edge phones, so that their Galaxy S7 Edge phones would be safe for use by consumers such as Plaintiff.

16. Before and at the time that Defendant, **SAMSUNG ELECTRONICS AMERICA, INC**, manufactured and placed into the stream of commerce the Galaxy S7 Edge phone used by Plaintiff, the Defendant was careless and negligent in one or more of the following ways:

- (a) Sold Galaxy S7 Edge phones when Defendant knew or should have known that its Galaxy S7 Edge phones were designed and manufactured with a propensity to suddenly explode or burst into flames;
- (b) Failed to provide adequate instructions or warnings for the use of its Galaxy S7 Edge phones;

FILED DATE: 5/23/2019 3:14 PM 2019L005640

- (c) Failed to warn of the dangerous propensities of its Galaxy S7 Edge phones, including but not limited to the risk of sudden explosion;
- (d) Failed to discover the defective condition of its Galaxy S7 Edge phones;
- (e) Failed to appropriately test its Galaxy S7 Edge phones before offering them for sale; and/or
- (f) Failed to inspect the components supplied by outside manufacturers which were incorporated into its Galaxy S7 Edge phones.

17. As a direct and proximate result of one or more of the aforementioned careless and negligent acts and/or omissions of the Defendant, **SAMSUNG ELECTRONICS AMERICA, INC.**, the Plaintiff, **LASHOYNA TAYLOR**, sustained serious and permanent injuries; was required to seek extensive medical consultation and treatment; has expended, and will in the future expend, great sums of money to be cured of her maladies; suffered, and will in the future continue to suffer, great pain, anguish, and physical and mental suffering; and was deprived of earnings to which she might otherwise have been entitled.

**WHEREFORE**, Plaintiff, **LASHOYNA TAYLOR**, prays for judgment against the Defendant, **SAMSUNG ELECTRONICS CO., LTD**, in such amount in excess of this Court's jurisdictional requisite as will fairly and adequately compensate the Plaintiff for her injuries, losses, and damages as hereinabove alleged.

**COUNT II – SAMSUNG ELECTRONICS AMERICA, INC.**  
**(Strict Product Liability)**

**NOW COMES**, the Plaintiff, **LASHOYNA TAYLOR**, by and through his attorneys, **KRALOVEC, JAMBOIS & SCHWARTZ**, and complaining of the Defendant, **SAMSUNG ELECTRONICS AMERICA, INC.**, states as follows:

1. - 14. For paragraphs 1 through 14 of Count II, Plaintiff re-alleges and incorporates paragraphs 1 through 14 of Count I.

15. At the time the Galaxy S7 Edge phone was manufactured, sold, and left the possession of the Defendant, **SAMSUNG ELECTRONICS AMERICA, INC.**, the Galaxy S7 Edge phone was defective, unsafe, and unreasonably dangerous for their intended and foreseeable use in one or more of the following ways:

- (a) The Galaxy S7 Edge phones were unreasonably dangerous in design due to the high degree of risk that the Galaxy S7 Edge would suddenly explode or discharge its battery contents;
- (b) The Galaxy S7 Edge phones were unreasonably dangerous due to manufacturing defects or omissions, which caused a propensity to suddenly explode or discharge its battery contents;
- (c) The Galaxy S7 Edge phones were unreasonably dangerous in that the Defendant provided inadequate safety devices, thereby failing to prevent their product from causing injury; and/or
- (d) The Galaxy S7 Edge phones were unreasonably dangerous in that the Defendant failed to warn the users of the dangerous condition of their Galaxy S7 Edge phones, including but not limited to the risk of sudden explosion.

16. As a direct and proximate result of one or more of the aforementioned careless and negligent acts and/or omissions of the Defendant, **SAMSUNG ELECTRONICS CO., LTD**, the Plaintiff, **LASHOYNA TAYLOR**, sustained serious and permanent injuries; was required to seek extensive medical consultation and treatment; has expended, and will in the future expend, great sums of money to be cured of her maladies; suffered, and will in the future continue to suffer, great pain, anguish, and physical and mental suffering; and was deprived of earnings to which she might otherwise have been entitled.

**WHEREFORE**, Plaintiff, **LASHOYNA TAYLOR**, prays for judgment against the Defendant, **SAMSUNG ELECTRONICS CO., LTD**, in such amount in excess of this Court's jurisdictional requisite as will fairly and adequately compensate the Plaintiff for her injuries, losses, and damages as hereinabove alleged.



**COUNT III – SAMSUNG SDI CO., LTD**  
**(Negligence)**

NOW COMES, the Plaintiff, LASHOYNA TAYLOR, by and through his attorneys, KRALOVEC, JAMBOIS & SCHWARTZ, and complaining of the Defendant, SAMSUNG SDI CO., LTD., states as follows:

1. - 14. For paragraphs 1 through 14 of Count III, Plaintiff re-alleges and incorporates paragraphs 1 through 14 of Count I.

15. At all relevant times, Defendant, SAMSUNG SDI CO., LTD., had a duty to use ordinary care in the design, preparation, manufacture, advertising, distribution, supply, and sale of its batteries used in Galaxy S7 Edge phones, so that its batteries would be safe for use by consumers such as Plaintiff.

16. Before and at the time that Defendant, SAMSUNG SDI CO., LTD., manufactured and placed into the stream of commerce the battery incorporated in the Galaxy S7 Edge phone used by Plaintiff, the Defendant was careless and negligent in one or more of the following ways:

- (a) Manufactured and supplied batteries which were incorporated into Galaxy S7 Edge phones when Defendant knew or should have known that their batteries were designed and manufactured with a propensity to suddenly explode or burst into flames;
- (b) Failed to provide adequate instructions or warnings regarding the dangers their batteries posed;
- (c) Failed to warn of the dangerous propensities of their batteries, including but not limited to the risk of sudden explosion or sudden discharge of its content;
- (d) Failed to discover the defective condition of their batteries;
- (e) Failed to appropriately test their batteries before offering them electronic manufacturers to incorporate into their products such as the Galaxy S7 Edge phones; and/or

- (f) Failed to inspect the batteries before selling, shipping, or offering the batteries to electronic manufacturers.

17. As a direct and proximate result of one or more of the aforementioned careless and negligent acts and/or omissions of the Defendant, **SAMSUNG SDI CO., LTD.**, the Plaintiff, **LASHOYNA TAYLOR**, sustained serious and permanent injuries; was required to seek extensive medical consultation and treatment; has expended, and will in the future expend, great sums of money to be cured of her maladies; suffered, and will in the future continue to suffer, great pain, anguish, and physical and mental suffering; and was deprived of earnings to which she might otherwise have been entitled.

**WHEREFORE**, Plaintiff, **LASHOYNA TAYLOR**, prays for judgment against the Defendant, **SAMSUNG SDI CO., LTD.**, in such amount in excess of this Court's jurisdictional requisite as will fairly and adequately compensate the Plaintiff for her injuries, losses, and damages as hereinabove alleged.

**COUNT IV– SAMSUNG SDI CO., LTD.**  
**(Strict Product Liability)**

**NOW COMES** the Plaintiff, **LASHOYNA TAYLOR**, by and through her attorneys, **KRALOVEC, JAMBOIS & SCHWARTZ**, and complaining of the Defendant, **SAMSUNG SDI CO., LTD.**, states as follows:

1. - 14. For paragraphs 1 through 14 of Count IV, Plaintiff re-alleges and incorporates paragraphs 1 through 14 of Count I.

15. At the time the battery was manufactured, sold, and left the possession of the Defendant, **SAMSUNG SDI CO., LTD.**, to be incorporated into electronics such as the Galaxy S7 Edge phones, the battery was defective, unsafe, and unreasonably dangerous for their intended and foreseeable use in one or more of the following ways:

FILED DATE: 5/23/2019 3:14 PM 2019L005640

- (a) The batteries were unreasonably dangerous in design due to the high degree of risk that the batteries would suddenly explode or discharge its contents;
- (b) The batteries were unreasonably dangerous due to manufacturing defects or omissions, which caused a propensity to suddenly explode or discharge its contents;
- (c) The batteries were unreasonably dangerous in that the Defendant provided inadequate safety devices, thereby failing to prevent their product from causing injury; and/or
- (d) The batteries were unreasonably dangerous in that the Defendant failed to warn the users of the dangerous condition of their batteries, including but not limited to the risk of sudden explosion.

16. As a direct and proximate result of one or more of the aforementioned careless and negligent acts and/or omissions of the Defendant, **SAMSUNG SDI CO., LTD.**, the Plaintiff, **LASHOYNA TAYLOR**, sustained serious and permanent injuries; was required to seek extensive medical consultation and treatment; has expended, and will in the future expend, great sums of money to be cured of her maladies; suffered, and will in the future continue to suffer, great pain, anguish, and physical and mental suffering; and was deprived of earnings to which she might otherwise have been entitled.

**WHEREFORE**, Plaintiff, **LASHOYNA TAYLOR**, prays for judgment against the Defendant, **SAMSUNG SDI CO., LTD.**, in such amount in excess of this Court's jurisdictional requisite as will fairly and adequately compensate the Plaintiff for her injuries, losses, and damages as hereinabove alleged.

**COUNT V- SAMSUNG SDI AMERICA, INC.**  
**(Negligence)**

**NOW COMES** the Plaintiff, **LASHOYNA TAYLOR**, by and through his attorneys, **KRALOVEC, JAMBOIS & SCHWARTZ**, and complaining of the Defendant, **SAMSUNG SDI AMERICA, INC.**, states as follows:

1. - 14. For paragraphs 1 through 14 of Count V, Plaintiff re-alleges and incorporates paragraphs 1 through 14 of Count I.

15. At all relevant times, Defendant, **SAMSUNG SDI AMERICA, INC.**, had a duty to use ordinary care in the design, preparation, manufacture, advertising, distribution, supply, and sale of its batteries used in Galaxy S7 Edge phones, so that its batteries would be safe for use by consumers such as Plaintiff.

16. Before and at the time that Defendant, **SAMSUNG SDI CO., LTD.**, manufactured and placed into the stream of commerce the battery incorporated in the Galaxy S7 Edge phone used by Plaintiff, the Defendant was careless and negligent in one or more of the following ways:

- (a) Manufactured and supplied batteries which were incorporated into Galaxy S7 Edge phones when Defendant knew or should have known that its batteries were designed and manufactured with a propensity to suddenly explode or burst into flames;
- (b) Failed to provide adequate instructions or warnings regarding the dangers its batteries posed;
- (c) Failed to warn of the dangerous propensities of its batteries, including but not limited to the risk of sudden explosion or sudden discharge of its content;
- (d) Failed to discover the defective condition of its batteries;
- (e) Failed to appropriately test its batteries before offering them electronic manufacturers to incorporate into their products such as the Galaxy S7 Edge phone; and/or
- (f) Failed to inspect its batteries before selling, shipping, or offering the batteries to electronic manufacturers.

17. As a direct and proximate result of one or more of the aforementioned careless and negligent acts and/or omissions of the Defendant, **SAMSUNG SDI AMERICA, INC.**, the Plaintiff, **LASHOYNA TAYLOR**, sustained serious and permanent injuries; was required to

seek extensive medical consultation and treatment; has expended, and will in the future expend, great sums of money to be cured of her maladies; suffered, and will in the future continue to suffer, great pain, anguish, and physical and mental suffering; and was deprived of earnings to which she might otherwise have been entitled.

WHEREFORE, Plaintiff, **LASHOYNA TAYLOR**, prays for judgment against the Defendant, **SAMSUNG SDI AMERICA, INC.**, in such amount in excess of this Court's jurisdictional requisite as will fairly and adequately compensate the Plaintiff for her injuries, losses, and damages as hereinabove alleged.

**COUNT VI- SAMSUNG SDI AMERICA, INC.**  
**(Strict Product Liability)**

NOW COMES the Plaintiff, **LASHOYNA TAYLOR**, by and through his attorneys, **KRALOVEC, JAMBOIS & SCHWARTZ**, and complaining of the Defendant, **SAMSUNG SDI AMERICA, INC.**, states as follows:

1. - 14. For paragraphs 1 through 14 of Count VI, Plaintiff re-alleges and incorporates paragraphs 1 through 14 of Count I.

15. At the time the battery was manufactured, sold, and left the possession of the Defendant, **SAMSUNG SDI AMERICA, INC.**, to be incorporated into electronics such as the Galaxy S7 Edge phones, the battery was defective, unsafe, and unreasonably dangerous for their intended and foreseeable use in one or more of the following ways:

- (a) The batteries were unreasonably dangerous in design due to the high degree of risk that the batteries would suddenly explode or discharge its contents;
- (b) The batteries were unreasonably dangerous due to manufacturing defects or omissions, which caused a propensity to suddenly explode or discharge its contents;

FILED DATE: 5/23/2019 3:14 PM 2019L005640

- (c) The batteries were unreasonably dangerous in that the Defendant provided inadequate safety devices, thereby failing to prevent its product from causing injury; and/or
- (d) The batteries were unreasonably dangerous in that the Defendant failed to warn the users of the dangerous condition of its batteries, including but not limited to the risk of sudden explosion.

16. As a direct and proximate result of one or more of the aforementioned careless and negligent acts and/or omissions of the Defendant, **SAMSUNG SDI AMERICA, INC.**, the Plaintiff, **LASHOYNA TAYLOR**, sustained serious and permanent injuries; was required to seek extensive medical consultation and treatment; has expended, and will in the future expend, great sums of money to be cured of her maladies; suffered, and will in the future continue to suffer, great pain, anguish, and physical and mental suffering; and was deprived of earnings to which she might otherwise have been entitled.

**WHEREFORE**, Plaintiff, **LASHOYNA TAYLOR**, prays for judgment against the Defendant, **SAMSUNG SDI AMERICA, INC.**, in such amount in excess of this Court's jurisdictional requisite as will fairly and adequately compensate the Plaintiff for her injuries, losses, and damages as hereinabove alleged.

**COUNT VII – T-MOBILE-USA, INC.**  
**(Breach of Implied Warranty)**

**NOW COMES** the Plaintiff, **LASHOYNA TAYLOR**, by and through his attorneys, **KRALOVEC, JAMBOIS & SCHWARTZ**, and complaining of the Defendant, **T-MOBILE USA, INC.**, states as follows:

1. - 14. For paragraphs 1 through 14 of Count VII, Plaintiff re-alleges and incorporates paragraphs 1 through 14 of Count I.

15. The Galaxy S7 Edge was unreasonably dangerous because it did not conform to implied warranties.

16. At all relevant and material times, Defendant, **T-MOBILE USA, INC.**, marketed, labeled, sold, distributed, and otherwise placed in to the stream of commerce Galaxy S7 Edge phones including the Galaxy S7 Edge at issue here.

17. Defendant, **T-MOBILE USA, INC.**, impliedly warranted that the Galaxy S7 Edge phone was merchantable and was fit for the ordinary purpose for which it was intended.

18. Defendant, **T-MOBILE USA, INC.**, impliedly warranted that its product was of merchantable quality, safe and fit for the indented regular phone use by Plaintiff, and was properly and adequately tested prior for the ordinary purposes for which it was intended.

19. When the Galaxy S7 Edge was used by Plaintiff, it was being used for its intended purposes of and in accordance with the instructions for use and product specifications provided by Defendants.

20. The Plaintiff was a foreseeable user of the Galaxy S7 Edge phone and was in privity with Defendant, **T-MOBILE USA, INC.**

21. Defendant, **T-MOBILE USA, INC.**, breached implied warranties with respect to their Galaxy S7 Edge, including, but not limited to the following particulars:

- (a) Defendants represented to Plaintiff labeling, advertising, marketing materials, user manuals, and sales representatives that the Galaxy S7 Edge was of merchantable quality and safe when used for its intended purpose while the Galaxy S7 Edge actually possessed an unreasonable danger of sudden explosion and discharging its harmful battery contents; and/or
- (b) Defendants represented to Plaintiff through its labeling, advertising, marketing materials, user manuals, and sales representatives that the Galaxy S7 Edge phone was as safe as other phones available on the market while it actually contained a dangerous propensity for sudden explosion and potential discharge of its contents.

22. Plaintiff relied upon Defendant's, **T-MOBILE USA, INC.**, implied warranties in purchasing and using the Galaxy S7 Edge.

23. Defendant, **T-MOBILE USA, INC.**, breached their implied warranties to Plaintiff because the Galaxy S7 Edge was not of merchantable quality, safe and fit for its intended use as warranted, nor was it adequately tested prior to being placed in the stream of commerce.

24. As a direct and proximate result of Defendant's, **T-MOBILE USA, INC.**, breach of the aforementioned implied warranties, the Plaintiff, **LASHOYNA TAYLOR**, sustained serious and permanent injuries; was required to seek extensive medical consultation and treatment; has expended, and will in the future expend, great sums of money to be cured of her maladies; suffered, and will in the future continue to suffer, great pain, anguish, and physical and mental suffering; and was deprived of earnings to which she might otherwise have been entitled.

**WHEREFORE**, Plaintiff, **LASHOYNA TAYLOR**, prays for judgment against the Defendant, **T-MOBILE USA, INC.**, in such amount in excess of this Court's jurisdictional requisite as will fairly and adequately compensate the Plaintiff for her injuries, losses, and damages as hereinabove alleged.

**COUNT VIII – T-MOBILE-USA, INC**  
**(Negligence)**

**NOW COMES** the Plaintiff, **LASHOYNA TAYLOR**, by and through his attorneys, **KRALOVEC, JAMBOIS & SCHWARTZ**, and complaining of the Defendant, **T-MOBILE USA, INC.**, states as follows:

1. - 14. For paragraphs 1 through 14 of Count VIII, Plaintiff re-alleges and incorporates paragraphs 1 through 14 of Count I.

15. At all relevant times, Defendant, **T-MOBILE USA, INC.**, had a duty to use ordinary care in the advertising, distributing, supplying, and selling of the Galaxy S7 Edge



phones, so that their Galaxy S7 Edge phones would be safe for use by consumers such as Plaintiff.

16. Before and at the time that Defendant, **T-MOBILE USA, INC.**, sold the Galaxy S7 Edge to the Plaintiff, the Defendant was careless and negligent in one or more of the following ways:

- (a) Advertised, distributed, and sold the Galaxy S7 Edge phone when Defendant knew or should have known that the Galaxy S7 Edge phone was unreasonably dangerous due to its propensity to suddenly explode or burst into flames;
- (b) Failed to provide adequate instructions or warnings regarding the dangers of the Galaxy S7 Edge phone;
- (c) Failed to warn of the dangerous propensities of the Galaxy S7 Edge including but not limited to the risk of sudden explosion or sudden discharge of its battery contents;
- (d) Failed to discover the defective condition and unreasonably dangerous nature of the Galaxy S7 Edge phone; and/or
- (e) Failed to appropriately inspect the Galaxy S7 Edge phone before advertising, distributing, or selling the Galaxy S7 Edge phones to Plaintiff and the public.

17. As a direct and proximate result of one or more of the aforementioned careless and negligent acts and/or omissions of the Defendant, **T-MOBILE USA, INC.**, the Plaintiff, **LASHOYNA TAYLOR**, sustained serious and permanent injuries; was required to seek extensive medical consultation and treatment; has expended, and will in the future expend, great sums of money to be cured of her maladies; suffered, and will in the future continue to suffer, great pain, anguish, and physical and mental suffering; and was deprived of earnings to which she might otherwise have been entitled.

**WHEREFORE**, Plaintiff, **LASHOYNA TAYLOR**, prays for judgment against the Defendant, **T-MOBILE USA, INC.**, in such amount in excess of this Court's jurisdictional

requisite as will fairly and adequately compensate the Plaintiff for her injuries, losses, and damages as hereinabove alleged.

**COUNT IX – T-MOBILE-USA, INC**  
**(Strict Product Liability)**

**NOW COMES** the Plaintiff, **LASHOYNA TAYLOR**, by and through his attorneys, **KRALOVEC, JAMBOIS & SCHWARTZ**, and complaining of the Defendant, **T-MOBILE USA, INC.**, states as follows:

1. - 14. For paragraphs 1 through 14 of Count IX, Plaintiff re-alleges and incorporates paragraphs 1 through 14 of Count I.

15. At the time the Galaxy S7 was advertised, marketed, distributed, sold, and left the possession of the Defendant, **T-MOBILE USA, INC.**, the Galaxy S7 Edge phone was defective, unsafe, and unreasonably dangerous for its intended and foreseeable use in one or more of the following ways:

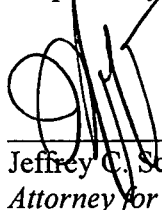
- (a) The Galaxy S7 Edge phone was unreasonably dangerous in design due to the high degree of risk that the Galaxy S7 Edge would suddenly explode or discharge its battery contents;
- (b) The Galaxy S7 Edge phone was unreasonably dangerous due to manufacturing defects or omissions, which caused a propensity to suddenly explode or discharge its battery contents;
- (c) The Galaxy S7 Edge phone was unreasonably dangerous in that the Defendant provided inadequate safety devices, thereby failing to prevent its product from causing injury; and/or
- (d) The Galaxy S7 Edge phone was unreasonably dangerous in that the Defendant failed to warn the users of the dangerous condition of its Galaxy S7 Edge phones, including but not limited to the risk of sudden explosion.

16. As a direct and proximate result of one or more of the aforementioned careless and negligent acts and/or omissions of the Defendant, **T-MOBILE USA, INC.**, the Plaintiff,

**LASHOYNA TAYLOR**, sustained serious and permanent injuries; was required to seek extensive medical consultation and treatment; has expended, and will in the future expend, great sums of money to be cured of her maladies; suffered, and will in the future continue to suffer, great pain, anguish, and physical and mental suffering; and was deprived of earnings to which she might otherwise have been entitled.

**WHEREFORE**, Plaintiff, **LASHOYNA TAYLOR**, prays for judgment against the Defendant, **T-MOBILE USA, INC.**, in such amount in excess of this Court's jurisdictional requisite as will fairly and adequately compensate the Plaintiff for her injuries, losses, and damages as hereinabove alleged.

Respectfully Submitted:



---

Jeffrey C. Schwartz  
*Attorney for the Plaintiff*

**KRALOVEC, JAMBOIS & SCHWARTZ**

60 W. Randolph St., 4th Floor

Chicago, Illinois 60601

Ph: 312-782-2525

Fx: 312-855-0068

Firm No. 24797

FILED  
5/23/2019 3:14 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL  
2019L005640

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

LASHOYNA TAYLOR,

Plaintiff,

v.

No. 2019L005640

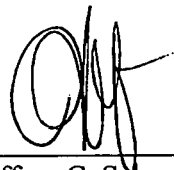
SAMSUNG ELECTRONICS AMERICA, INC., a  
New York corporation, SAMSUNG SDI CO., LTD.,  
a Foreign corporation, SAMSUNG SDI AMERICA,  
INC., a California corporation, and T-MOBILE  
USA, INC., a Delaware corporation.

Defendants.

**JURY DEMAND**

The undersigned demands a trial by jury.

BY:

  
\_\_\_\_\_  
Jeffrey C. Schwartz

Jeffrey C. Schwartz  
**KRALOVEC, JAMBOIS & SCHWARTZ**  
60 West Randolph Street, 4th Floor  
Chicago, IL 60601  
T: (312) 782-2525  
F: (312) 855-0068  
E: [jschwartz@kjs-law.com](mailto:jschwartz@kjs-law.com)  
Firm No: 24797

FILED DATE: 5/23/2019 3:14 PM 2019L005640

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

FILED  
5/23/2019 3:14 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL  
2019L005640

LASHOYNA TAYLOR,

Plaintiff,

v.

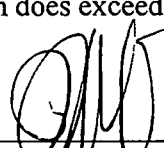
No. 2019L005640

SAMSUNG ELECTRONICS AMERICA, INC., a  
New York corporation, SAMSUNG SDI CO., LTD.,  
a Foreign corporation, SAMSUNG SDI AMERICA,  
INC., a California corporation, and T-MOBILE  
USA, INC., a Delaware corporation.

Defendants.

AFFIDAVIT OF DAMAGES  
SUPREME COURT RULE 222

The undersigned being first duly sworn upon oath, deposes and states that he is the attorney representing the Plaintiff in the above entitled cause of action seeking money damages or collection of taxes and states that this cause of action does exceed \$50,000.00.

  
Jeffrey C. Schwartz  
Attorney for the Plaintiff

SUBSCRIBED AND SWORN to before  
me on this 23 day of May, 2019.

  
NOTARY PUBLIC

KRALOVEC, JAMBOIS & SCHWARTZ  
60 W. Randolph Street, 4<sup>th</sup> Floor  
Chicago, IL 60601  
(312) 782-2525  
Firm ID: 24797

